## ORAL ARGUMENT ON PETITION FOR REVIEW SCHEDULED FOR NOVEMBER 21, 2019

## UNITED STATES COURT OF APPEALS DISTRICT OF COLUMBIA CIRCUIT

DHSC, LLC d/b/a AFFINITY MEDICAL CENTER,

: Docket No: 15-1426 Petitioner : 15-1499

versus

NATIONAL LABOR RELATIONS BOARD,

Respondent

and

NATIONAL NURSES ORGANIZING COMMITTEE,

Intervenor

DHSC, LLC d/b/a AFFINITY MEDICAL CENTER'S UNOPPOSED
MOTION FOR AN EXTENSION OF TIME TO FILE ITS RESPONSE AND
OPPOSITION TO THE MOTION FOR SANCTIONS FILED BY THE
NATIONAL NURSES ORGANIZING COMMITEE

Petitioner DHSC, LLC d/b/a Affinity Medical Center (hereafter, "DHSC, LLC" or the "Hospital"), by and through the Hospital's Undersigned Counsel, hereby moves that the time for filing the Hospital's Response and Opposition to the Motion for Sanctions filed by the Intervenor National Nurses Organizing

Committee (hereafter, the "Intervenor") be extended by one week, from October 24, 2019 to October 31, 2019. The Hospital requests this extension of time because on Friday, October 18, 2019, the Undersigned Counsel was provided notice by a separate client of a petition for a representation election at its facility that was filed with the National Labor Relations Board, and a related representation case hearing before the National Labor Relations Board scheduled for Monday, October 28, 2019. This development requires the Undersigned Counsel to undertake unplanned travel during the course of the week of October 21, 2019, and will severely limit the Undersigned Counsel's time to adequately prepare its Response and Opposition to the Motion for Sanctions filed by the National Nurses Organizing Committee. The Undersigned Counsel has informed Counsel for the Intervenor and Counsel for the National Labor Relations Board of

WHEREFORE, the Hospital respectfully requests that this Court grant the Hospital's Unopposed Motion and extend the time for filing of the Hospital's Response and Opposition to the Intervenor's Motion for Sanctions to October 31, 2019.

the Hospital's Motion, and neither party opposes the Hospital's Motion.

Dated: Atlanta, Georgia

October 21, 2019

Respectfully Submitted,

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KAITLIN KASETA LAMMERS, ESQ. Counsel for Petitioner 1035 Euclid Avenue NE Atlanta, Georgia 30307 (860) 307-3223 kkaseta@carmodyandcarmody.com

Filed: 10/21/2019

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DHSC, LLC d/b/a AFFINITY MEDICAL CENTER,

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Intervenor

# CERTIFICATE OF COMPLIANCE FOR PETITIONER'S <u>UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE ITS</u> <u>RESPONSE AND OPPOSITION TO THE MOTION FOR SANCTIONS</u> FILED BY THE NATIONAL NURSES ORGANIZING COMMITEE

1. The Petitioner's Unopposed Motion for an Extension of Time to File Its Response and Opposition to the Motion for Sanctions filed by the National Nurses Organizing Committee (the "Motion") complies with the type-volume limit of Fed. R. App. P. 32(g)(1) because the Motion contains 242 words.

2. The Motion complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. 32(a)(6) because the Motion has been prepared in a proportionally-spaced typeface using Microsoft Word in 14-point Times New Roman font.

Dated: Atlanta, Georgia October 21, 2019

Respectfully Submitted,

/s/

KAITLIN KASETA LAMMERS, ESQ. Counsel for Petitioner 1035 Euclid Avenue NE Atlanta, Georgia 30307 (860) 307-3223 kkaseta@carmodyandcarmody.com

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and

NATIONAL NURSES ORGANIZING COMMITTEE,

Intervenor

### :

#### **CERTIFICATE OF SERVICE**

I hereby certify that, on October 21, 2019, I electronically filed the foregoing with the Clerk of the Court of the United States Court of Appeals for the District of Columbia Circuit by using the appellate CM / ECF system.

I certify that the foregoing document was served on all those parties or their counsel of record through the CM / ECF system if they are registered users, or if they are not, by serving a true and correct copy at the addresses listed below:

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Dated: Atlanta, Georgia October 21, 2019 Respectfully Submitted,

/s/

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